

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

The Goodyear Tire and Rubber Company
1901 Goodyear Boulevard - Danville, Virginia
Permit No. SCRO- 30106

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, The Goodyear Tire and Rubber Company has applied for a Title V Operating Permit for its Danville, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee

The Goodyear Tire and Rubber Company
1901 Goodyear Boulevard
Danville, Virginia 24541

Facility

The Goodyear Tire and Rubber Company
1901 Goodyear Boulevard
Danville, Virginia

County-Plant Identification Number: 51-590-00013

SOURCE DESCRIPTION

NAICS Code: 326211 – Manufacturing of rubber tires for trucks and aircraft.

The Goodyear Tire and Rubber Company is a manufacturer of truck and aircraft tires. The tire manufacturing process begins with mixing of raw materials (including synthetic and natural rubber, carbon black, sulfur, accelerators, and process oils). Mixed rubber is then extruded (formed into predetermined shapes such as tread, or sidewall) or calendered (applied to a substrate to form specific gauge rubber sheets). Individual tire components are transferred to tire building stations where they are assembled into tires. Depending on the tackiness of the rubber prior to assembly and the type of tire being constructed, solvent may be applied at the tire building stations. Assembled ("green") tires are then cured within steam-heated curing presses. Depending on the tire, balance pads may be applied to the inside of the tire.

Based on Goodyear's permit renewal application, the facility is a Title V major source of SO₂, VOC, NO_x, PM₁₀, CO, total HAPs, and MiBK. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under three permits. The principle permit is a PSD Permit issued on September 4, 2002 covering a large portion of the plant (i.e., Mixing, Curing, and Finishing equipment, and including Plantwide limits). The facility also has two more narrowly focused modified source permits; one dated 5/28/81 (as amended 4/11/89 and 9/6/00) to allow burning used oil in their Keeler Boiler (EU038), and the other dated 6/15/05 for a truck tire reclaim grinder (RG-1).

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In

addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility was issued a Warning Letter on 8/20/07 alleging noncompliance with 10/20/06 Title V permit conditions V.A.7 and XII.O. As noted in "Mixing Equipment Limitations" section below, Goodyear is adding controls to address the topic the warning letter.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units, pollution control devices, and stacks are those units as described in the table of Section II of this Title V permit.

EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2006 Actual Emissions

	2006 Criteria Pollutant Emission in Tons/Year				
	SO ₂	VOC	NO _x	PM ₁₀	CO
Total	205.7	434.4	162.2	44.4	39.7

2006 Facility Hazardous Air Pollutant Emissions

Pollutant	2006 Hazardous Air Pollutant Emission in Tons/Yr
Carbon Disulfide	6.1
Ethylbenzene	1.1
Methylene Chloride	4.2
MiBK	13.3
Hexane	1.9
o-Xylene	1.2
Lead	0.002

EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at Goodyear Danville. These requirements come from the PSD permit dated September 4, 2002, the NSR permit dated May 28, 1981 (as amended April 11, 1989 and September 6, 2000) for the Keeler Boiler, the NSR permit dated 6/15/05 for a truck tire reclaim tire grinder (RG-1), and applicable federal requirements. The conditions are not repeated verbatim from the permit.

Section III of Title V Permit – Fuel Burning Equipment (EU035, EU036, EU037 (B&W boilers) and EU038 (Keeler boiler))

Fuel Burning Equipment Limitations

B&W boilers

The limits for the B&W boilers are based on the Title V permit content requirements, and the existing source regulations, and include approved fuel types, emission limits, and visible emission limits.

Keeler boiler

The limits for the Keeler boiler are based on the 5/28/81 permit, as amended 4/11/89 and 9/6/00. These limits include visible emission limits, approved fuel types and specifications, and allowable fuel throughput.

Fuel Burning Equipment Maintenance/Operating Procedures

Two conditions specifying general operation and maintenance requirements for the boilers are included.

Fuel Burning Equipment Monitoring

Periodic visible emissions observations are required for fuel burning equipment stacks.

For the B&W boilers, if fuel oil usage is at or above a specified threshold, once-per-permit term PM testing is required on a rotating basis to satisfy the Title V periodic monitoring requirements.

Fuel Burning Equipment Recordkeeping

Records of visible emissions observations, fuel usage, fuel analysis, and boiler operator training must be kept to demonstrate compliance.

Fuel Burning Equipment Testing

None beyond that specified under Fuel Burning Equipment Monitoring.

Fuel Burning Equipment Reporting

For the Keeler boiler, quarterly fuel oil and used oil usage reports, and annual used oil analysis reports are required.

Fuel Burning Equipment Streamlined Requirements

None

Section IV of Title V Permit – Receiving Equipment (EU042)

The Receiving Equipment includes both Existing and New sources as distinguished in the 9

VAC 5 Chapters 40 and 50.

Receiving Limitations

The limits for the receiving equipment are based on the existing source compliance requirements, the existing source PM standards, and the existing and new source visible emission standards. These limits include specification of the air pollution control devices, PM emission limits, and visible emission limits.

Receiving Maintenance/Operating Procedures

A condition specifying general operation and maintenance requirements for the receiving equipment is included.

Receiving Monitoring

Visible emissions observations are required for the receiving equipment.

Receiving Recordkeeping

Records of visible emissions observations must be kept to demonstrate compliance.

Receiving Testing

None

Receiving Reporting

None

Receiving Streamlined Requirements

None

Section V of Title V Permit – Mixing Equipment (EU001 through EU009)

Mixing Equipment Limitations

The limits for the mixing equipment are principally from the 9/4/02 permit, and include specification of air pollution control devices, a production limit on the amount of pelletized rubber, PM emission limits, visible emission limits, a VOC emission limit, and ethanol emission limits. For CAM applicability determination reasons, the existing source PM emission limit from the shaker coolers, which was left unstated in the former Title V permit, is explicitly stated in the current renewal.

Air pollution control device specifications for the two shaker coolers are from the existing source compliance requirements.

Goodyear is adding control to the ram air exhausts for Banburys #2 and #3 (EU003R, and

EU005R) to ensure compliance with the visible emission standards for these points.

Mixing Equipment Maintenance/Operating Procedures

A condition specifying general operation and maintenance requirements for the mixing equipment is included.

Mixing Equipment Monitoring

Periodic visible emissions observations are required for the mixing equipment stacks.

Once-per-permit term PM testing for baghouses BBDC1 through BBDC9 is required on a rotating basis to satisfy the Title V periodic monitoring requirements.

Compliance Assurance Monitoring (CAM) requirements are added for the two shaker cooler cyclones.

Mixing Equipment Recordkeeping

Records of the visible emission observations, pelletized rubber production, coupling agent usage, baghouse BBDC1 through BBDC9 maintenance or construction activities, VOC emissions, ethanol emission, and stack test results must be kept to demonstrate compliance.

CAM recordkeeping requirements are added.

Mixing Equipment Testing

The Title V permit includes a general testability requirement from the 9/4/02 permit.

Mixing Equipment Reporting

CAM reporting requirements are added.

Mixing Equipment Streamlined Requirements

None

Section VI of Title V Permit – Rubber Extruding/Calendering Equipment

Rubber Extruding/Calendering Limitations

None

Rubber Extruding/Calendering Maintenance/Operating Procedures

None

Rubber Extruding/Calendering Monitoring

None

Rubber Extruding/Calendering Recordkeeping

Base on new source recordkeeping requirements, the amount of rubber extruded and calendered must be maintained.

Rubber Extruding/Calendering Testing

None

Rubber Extruding/Calendering Reporting

None

Rubber Extruding/Calendering Streamlined Requirements

None

Section III of Title V Permit – Curing and Finishing Equipment (EU050, EU150, EU150-A, and EU044 through EU046)

Curing and Finishing Limitations

The limits for the curing and finishing equipment are from the 9/4/02 permit, and include uncontrolled non-ethanol VOC emission limits for curing, visible emission limits for curing, and air pollution control device specification for tire balancing.

Curing and Finishing Maintenance/Operating Procedures

None

Curing and Finishing Monitoring

Periodic visible emissions observations are required for the curing presses.

Curing and Finishing Recordkeeping

Based on the 9/4/02 permit, records of the visible emission observations, annual cured rubber production, and VOC emissions must be kept.

Curing and Finishing Testing

None

Curing and Finishing Reporting

None

Curing and Finishing Streamlined Requirements

None

Section VIII of Title V Permit – Facility Wide

Facility Wide Limitations

The facility wide limits are from the 9/4/02 permit, and include an ethanol emissions limit, allowable coupling agents requirements, a VOC from refresher solvent emission limit, VOC housekeeping requirements. Note: At Goodyear's request, refresher solvent 80/10/10 is removed from the list of approved materials.

Facility Wide Maintenance/Operating Procedures

None

Facility Wide Monitoring and Recordkeeping

Based on the 9/4/02 permit, records of:

- the annual consumption of each coupling agent,
- coupling-agent-specific characteristics,
- ink, adhesive, and refresher solvent MSDSs,
- refresher solvent emission calculations, and
- ethanol emission calculations

must be kept to demonstrate compliance.

Facility Wide Testing

None

Facility Wide Reporting

None

Facility Wide Streamlined Requirements

None

Section IX of Title V Permit – Tire MACT

Limitations, continuous compliance requirements, notification-reporting-recordkeeping requirements, and general provisions for the 40 CFR Subpart XXXX are included in this Title V permit

Section X of Title V Permit – Supporting Equipment (RG-1)

Supporting Equipment Limitations

The supporting equipment limits are from the 6/15/04 permit, and include tire grinder air pollution control device specification (including differential pressure measuring device), visible emissions limit, and PM/PM10 emission limits.

Supporting Equipment Maintenance/Operating Procedures

A condition specifying general operation and maintenance requirements for the tire grinder from the 6/15/04 permit is included.

Supporting Equipment Monitoring

Periodic visible emissions observations are required for the tire grinder stack.

Supporting Equipment Recordkeeping

Records of the visible emission observations, emission calculations, and maintenance/training records must be kept.

Note: The minimum size of an affected facility for NSPS Kb changed in 2003 from approximately 10,500 to approximately 19,800 gallons. Therefore, the 15,000 gallon tank (T010) is no longer subject to NSPS Kb and so, the Kb-based requirement to keep records of the capacity of this tank is removed from the current renewal permit. Also, since there were no other applicable requirements for T010, it is moved to the insignificant emissions units table.

Supporting Equipment Testing

The Title V permit includes a general testability requirement from the 6/15/04 permit.

Supporting Equipment Reporting

None

Supporting Equipment Streamlined Requirements

None

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources, and uses the currently approved (boilerplate) language for these conditions. The general conditions include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-2003”.

G. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

V. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition **V** and General Condition **G**. For further explanation see the comments on general condition **G**.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

In their decision dated 6/8/07 the District of Columbia Circuit Court of Appeals vacated 40 CFR Subpart DDDDD (the boiler MACT). Specific guidance on how to address this situation is currently being considered, and will be applied when available. Prior to vacatur, the only boiler MACT applicable requirement for the four “large liquid fueled” boilers was initial notification and Goodyear had satisfied that requirement on 3/3/05.

INAPPLICABLE REQUIREMENTS

The inapplicable requirements, as described in the table of Section **XII** of this Title V permit, are:

40 CFR 60, Subpart D	Steam Generating Units Constructed after 8/17/71
40 CFR 60, Subpart Db	Industrial-Commercial-Institutional Steam Generating Units (100-250 MMBTU/hr)
40 CFR 60, Subpart Dc	Industrial-Commercial-Institutional Steam Generating Units (10-100 MMBTU/hr)
40 CFR 60, Subpart BBB	Rubber Tire Manufacturing
40 CFR 60, Subpart VVV	Polymeric Coating of Supporting Substrates Facilities

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

COMPLIANCE PLAN

None at this time.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units are shown in the table contained in Section **XI** of the permit.

CONFIDENTIAL INFORMATION

No change from initial Title V permit application dated 10/23/00.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Danville Register from September 11, 2007 to October 11, 2007.